

Pam Bassel
Chapter 13 Standing Trustee
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:

**JOHN STACEY SCHOLL SR &
HELENE MARIE SCHOLL**

Debtors

Case No: 15-40537-ELM

**Hearing Date:
August 30, 2019**

Docket Call at 8:30 AM

**TRUSTEE'S OBJECTION TO DEBTORS' MODIFICATION OF
CHAPTER 13 PLAN**

TO THE HONORABLE EDWARD L. MORRIS, U.S. BANKRUPTCY JUDGE:

Now comes Pam Bassel, the Standing Chapter 13 Trustee and files this "Trustee's Objection to Modification of Chapter 13 Plan" heretofore filed herein by Debtors, and for the same would respectfully show the Court as follows:

The Modified Plan fails to meet the "feasibility" requirements of 11 U.S.C. § 1329(b)(1) and 11 U.S.C. § 1325 (a)(6). In this regard, the Trustee would show that the Debtors' Modified Plan provides for the following plan

<u>Start Date</u>	<u>Pmt Amt</u>	<u>Frequency</u>	<u># of Periods</u>
08/05/2019	\$1,100.00	Monthly	1
09/05/2019	\$1,590.00	Monthly	6

In this regard, the Debtors' projected monthly disposable income per Schedules I and J is \$1,104.72. Therefore, the modified Plan does not appear to be feasible for that reason, and for the reason(s) set forth below, if any.

Debtor has not provided amended Schedules I and J and recent income records to substantiate feasibility of the modified Plan.

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that said modified Plan not be confirmed unless and until it has been modified to cure all objections set forth herein above, and for general relief.

Respectfully submitted,

By: /s/ Pam Bassel
Pam Bassel, Bar# 01344800
Standing Chapter 13 Trustee
Ethan Cartwright, Bar# 24068273
Staff Attorney
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing "Trustee's Objection to Modification of Chapter 13 Plan" was served on all parties enlisted to receive electronic notice on August 06, 2019, as well as all parties entitled to receive notice but not enlisted to receive electronic notice (including the Debtor and parties who have filed a notice of appearance requesting service by mail) by first class mail, postage prepaid, on or before August 06, 2019.

/s/ Pam Bassel

Pam Bassel